

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Bradley Tollefson

Case No. 18-m-034

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 16-17, 2017 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2251(a)

production of child pornography

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Christina Porter

Complainant's signature

Christina Porter, TFO FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: Feb. 20, 2018

David E. Jones

Judge's signature

City and state: Milwaukee, Wisconsin

David E. Jones, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, Christina Porter, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Detective with the West Allis Police Department and am currently assigned to the Sensitive Crimes Unit. I have been a law enforcement officer since May of 2004. As part of my official duties, I am currently assigned as a Task Force Officer (TFO) to the FBI's Child Exploitation Task Force, Milwaukee Division. As part of my duties as a Detective and Task Force Officer, I investigate violations of law relating to child pornography and exploitation. I have gained experience in conducting these investigations through training and through my everyday work as a Sensitive Crimes Detective and Task Force Officer. That work frequently includes executing search warrants and conducting interviews of subjects suspected of trading and manufacturing of child pornography or otherwise sexually exploiting children with the use of technology. I have received training relating to the investigation of Internet Crimes Against Children ("ICAC"), including training in the investigation and enforcement of state and federal child pornography laws in which computers and other digital media are used as a means for receiving, transmitting, and storing child pornography.

2. The facts contained in this affidavit are known to me through my personal knowledge, training, and experience, and through information provided to me by other law enforcement officers, who have provided information to me during the course of their

official duties and whom I consider to be truthful and reliable. Some of the information was provided in response to administrative subpoenas and search warrants, and I believe that this information is also reliable.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my personal participation in this investigation, and on the basis of other information which I have reviewed and determined to be reliable, I allege that the facts contained in this affidavit show there is probable cause to believe that on or about October 16-17, 2017, in the State and Eastern District of Wisconsin, and elsewhere, Bradley Tollefson committed a federal felony offense, production of child pornography, in violation of 18 U.S.C. § 2251(a).

DEFINITIONS OF TECHNICAL TERMS

5. Based on my training and experience, I use the following technical terms to convey the following meanings:

a. The "Internet" is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

b. "Internet Service Providers" (ISPs) are commercial organizations that are in business to provide individuals and businesses access to the Internet. ISPs provide a range of functions for their customers including access to the Internet, web hosting, e-mail, remote storage, and co-location of computers and other communications equipment. ISPs can offer a range of options in providing access to the Internet including telephone based dial-up, broadband based access via digital subscriber line (DSL) or cable television, dedicated circuits, or satellite based subscription. ISPs typically charge a fee based upon the type of connection and volume of data, called bandwidth, which the connection

supports. Many ISPs assign each subscriber an account name – a user name or screen name, an “e-mail address,” an e-mail mailbox, and a personal password selected by the subscriber. By using a computer equipped with a modem, the subscriber can establish communication with an Internet Service Provider (ISP) over a telephone line, through a cable system or via satellite, and can access the Internet by using his or her account name and personal password.

c. “An Internet Protocol address” (IP address) is a unique numeric address used by internet-enabled electronic storage devices to access the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every electronic storage device attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that electronic storage device may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static, that is, long-term IP addresses, while other computers have dynamic, that is, frequently changed IP addresses.

d. Hash Algorithm: Files being shared by P2P clients are processed by the client software. As part of this processing, a hashed algorithm value (i.e. MD5, SHA-1, and eD2K MD4) is computed for each file being shared, which uniquely identifies it on the network. A file processed by this hash algorithm operation results in the creation of an associated hash value often referred to as a digital signature. Some hash algorithms provide a certainty exceeding 99.99 percent that two or more files with the same hash value are identical copies of the same file regardless of their file names. The slightest alteration of any file will result in a completely different hash value. By using a hash algorithm to uniquely identify files on a P2P network, the network efficiency is greatly improved. Because of this, typically, users may download a selected file from numerous sources by accepting different segments of the same file from each source and then reassembling the complete file on the local computer. This is referred to as multiple-source downloads. The client program succeeds in reassembling the file from different sources only if all the segments came from exact copies of the same file. P2P file sharing networks use hash values to ensure exact copies of the same file are used during this process.

PROBABLE CAUSE

6. This affidavit is based on official City of West Allis Police case 17-050430 and Pierce County Sheriff’s Office case 201700014651. This incident involves the sexual exploitation of a juvenile with the initials MH (full name is known by law enforcement) and the production of child pornography.

7. On December 15, 2017, I was informed by my supervisor that Investigator Thomas Bauer of the Pierce County Sheriff's Office contacted the West Allis Police Department in regards to a sexual exploitation of a child/possession of child pornography case he was investigating. The victim, MH, age 13, resides in Pierce County, and Investigator Bauer believed the offender resided in West Allis, WI.

8. Investigator Bauer provided me with the Pierce County police report, in addition to a USB drive consisting of subpoena returns and other documents related to the case. I reviewed the police report, which stated that Deputy Jean Spletstoser responded to the victim's residence (address known by law enforcement) and spoke with the parents of MH, JH and SH (identities known by law enforcement). JH and SH told Deputy Spletstoser that MH had been giving inappropriate pictures and videos to men on her cell phone via Live.me and Skype since September 5, 2017. (Note: MH did not have a cell phone prior to that date.)

9. I am aware that Skype is a software product that specializes in providing video chat and voice calls between computers, tablets, mobile devices, the Xbox One console, and smartwatches via the Internet and to regular telephones. Skype also provides instant messaging services and users may transmit both text and video messages, and may exchange digital documents such as images, text, and video. Live.me is a live streaming video application that allows users to watch or broadcast live-stream videos. Broadcasters can respond to comments and engage their viewers. Users on Live.me can also direct message one another. Live.me viewers can comment on videos and give "gifts" to

broadcasters. Users can purchase coins, which is the Live.me currency, through their Live.me profile and then use the coins to purchase ever-changing virtual gifts (goods) out of a gift box. There is a gift box icon on each broadcast, and these virtual gifts can be given to the broadcaster after they are purchased with coins. For example, a virtual snowman can be purchased with ten Live.me coins, whereas a virtual castle can be purchased with 19,999 Live.me coins. When a broadcaster receives a gift, the broadcaster's profile is assigned the same number of "diamonds" as the item cost to purchase in the Live.me gift store. Therefore, if a broadcaster received a snowman as a gift, that broadcaster would be given ten diamonds in their account. Once the broadcaster has enough diamonds, he/she can cash them out for real money or convert them back into coins.

10. On November 5, 2017, JH picked up MH from MH's grandmother's house. MH's grandmother told JH that MH had been talking to an unknown male on Skype on MH's cell phone. MH admitted to talking to this male and other males online. MH also admitted that she had sent photos of herself to these men. JH then looked through MH's cell phone and located photos and videos of MH naked and touching herself. JH also observed requests from the men to MH for these types of images and videos. JH said that MH also has Skype and the Live.me application on MH's phone.

11. JH reported that one of the men MH was communicating with had told MH his name was Chord Bennett and his Skype username is jbscuz. This individual had asked MH for images and videos of herself.

12. Investigator Bauer was assigned to follow up on this investigation and spoke with MH at her school on November 10, 2017. MH said she met "Chord Bennett" on Live.me and also used Skype with him. MH met Chord while she was doing a live public broadcast on Live.me, and she started to communicate with him through direct messages. MH told Investigator Bauer that Chord Bennett asked her to "finger" herself and show her breasts. MH said Chord offered to show her a penis picture, but she told him no, and she ended up blocking him after a few days. MH said that she did send Chord a video of her "fingering" herself and ten or less photos of herself. MH said she had told Chord that she was only 13 years old prior to sending him anything. MH and her parents gave consent for Investigator Bauer to have a search conducted of MH's cell phone.

13. MH's cell phone (an Apple iPhone 5S with the unique ID number of 05803ACD521EE2F15CA2C241F08299587717CBD0) was later turned over to Investigator Demulling of St. Croix County Sheriff's Office for a forensic examination. The result of the forensic examination was then turned over to Investigator Bauer, who located child pornographic images of MH in the phone's gallery. On January 29, 2018, I received a hard drive from Investigator Bauer that contained the cell phone extraction report. I reviewed the images section of the Cellebrite report and located approximately 56 images that appear to be related to this investigation. All of these images were created on October 17, 2017, which is the date of MH's conversation with bennettc on Live.me when he requested images from her. The images were also consisted with the requests made by bennettc. A sample of some of the images I observed were: Image #198: This is a picture of MH's upper body

and face. Her gray shirt is pulled up under her chin, revealing a blue and black bra. The file number for this image is IMG_0094.JPG/5003.JPG. Image #229: This is a picture of MH's nude breasts and she is pushing them together with the sides of her upper arms. Her gray shirt and blue and black bra are pulled up under her chin. The file number for this image is IMG_0096.JPG/5003.JPG. Image #254: This is a close up image of MH's nude vagina with her fingers inside of it. The lower portion of her gray shirt can be seen on her stomach. The file number for this image is IMG_0092.JPG/5003.JPG. I believed this was an image of child pornography. In addition, on October 13, 2017, MH used Safari on her cell phone to conduct a search for "sex dares."

14. On November 16, 2017, Investigator Bauer was granted a subpoena for Live.me. Investigator Bauer obtained IP address logs for the account user name associated with Chord Bennett, "bennettc". There were several different IP addresses utilized by bennettc to access Live.me. During the time period that the user of the bennettc account was communicating with MH, he was using the IP address of 99.48.237.144. It was determined that this IP address is assigned to AT&T Internet Services. Investigator Bauer issued a subpoena to AT&T for the subscriber information for the account assigned this IP address on October 15, 2017 at 20:54 UTC. On December 15, 2017, AT&T replied that the subscriber on that date and at that time was Chad Wagner of 7645 W. Dakota St. in West Allis, WI.

15. Investigator Bauer used TLO to conduct a search for Chad Wagner. He identified a Chad E. Wagner with a date of birth of September 14, 1981 whose listed address

matched that provided in AT&T's subpoena response. At this point, Investigator Bauer contacted WAPD, and the investigation was turned over to me.

16. On January 4, 2018, I reviewed all of the information provided by Investigator Bauer on the USB drive. In a folder labeled Live Me, there were 53 video clips of MH doing Live.me videos. These clips included her doing makeup, showing her dog, and other activities. It was through these videos that other Live.me users could then send MH direct messages, which were private between the two users. I observed that the girl in the Live.me videos appeared to be the same girl in the child pornographic images that had been found on MH's cell phone.

17. I also reviewed the IP logs for the bennettc account. At the top of the log was the username bennettc and a registration date and time of July 10, 2016 at 22:35:12, China Standard Time. The "source of user" is listed as bradtoll41@gmail.com. The listed IP addresses included all the times this account user logged into Live.me between June 28, 2017 and November 25, 2017.

18. I also reviewed the private message content between MH's Live.me account and bennettc's account. On October 16, 2017 bennettc initiated private messages with MH on Live.me and Bennettc told MH she was "hot" and asked if she was single. Bennettc also asked MH on October 16, 2017 how old she was. MH responded that she is 13. On October 17, 2017, bennettc asked MH for a picture, but she initially said no. Bennettc asked MH "can u show tummy and chest" and MH said just her tummy. Bennettc told her to take one (picture) in her bra. As he continued to ask for pictures, MH said, "Never mind I'll just take

a pic." Bennettc wrote, "can barely see it," and told her to lift up all the way because he likes small chests. He wrote, "dare to show chest I'll send castle," referring to an expensive virtual gift on Live.me that viewers can give broadcasters. Bennettc told MH he would send her a picture of him in his boxers. As the conversation continued, bennettc asked MH to show her underwear and to take her underwear off. He wrote, "dare u to take video of u showing inside it spread it open with fingers." MH told him she would do it that night, but he told her to go into the bathroom to do it right away. Bennettc wrote, "mmm how did it feel" and "can u go get a hairbrush or like a makeup brush or something with round handle out it in u inside of finger it will feel like a dik in u will love it." MH said she did it and that she had sent bennettc two videos. He asked her to "take one of chest again but push them together once" and MH agreed to do so. Also on October 17, 2017, Bennettc told MH, "ya make sure u hit the 3 dots above and delete chat history ok," and, "and go into your myfiles or gallery on phone delete the pics and vids ok." He told MH to meet him on Skype and that his username is jbscuz.

19. I also reviewed 268 pages worth of chat messages between bennettc and other Live.me users. In these conversations, bennettc asked multiple users how old they were, and they mostly responded that they were between the ages of 12 and 17. He told these individuals the same things he had told MH about how he thought they were hot and he wanted to see them. He asked whether they were single and said he wanted to be their boyfriends. Although Live.me did not retain any photos as part of the chats it provided, it

appears that some of the users did provide bennettc with images based on the contents of their conversations.

20. On January 5, 2018, I conducted a search on Facebook for a profile under the name of Chad Wagner. I located an account under the URL of www.facebook.com/chad.wagner.735 that had pictures on it that matched Chad Wagner's DOT photo. There were images and posts on the Facebook page indicating that Chad had married Lindsay Wagner on June 6, 2014. I used a link to observe Lindsay Wagner's Facebook profile page, which has a URL of www.facebook.com/lindsay.tollefson. I ran Chad Wagner's name through Accurint and saw that he possibly resides with Lindsay R. Tollefson, date of birth September 29, 1980. I ran Lindsay Wagner's name through NCIC/DOT and determined that Tollefson was her maiden name before she married Chad.

21. I recalled that the email address that was used to create the bennettc Live.me account, as provided by Live.me in the IP address log, was bradtoll41@gmail.com. I believed that "toll" was likely a shortened version of Tollefson and that the suspect in this case may be a relative of Lindsay Wagner. I ran the name of Lindsay Wagner in Accurint and obtained information on her known relatives. I located a relative by the name of Bradley Tollefson, with a birthdate of March 4, 1975. This would make Bradley 42 years old at the time of his conversations with MH, which may account for the number 41 in the email address of bradtoll41@gmail.com if he had created this email address when he was 41 years old.

22. I ran the name of Bradley Tollefson through Accurint and saw that he had a past listed address of 9724 W. Beloit Rd. in Milwaukee. I remembered seeing this same address listed as a past address on Chad Wagner's Accurint report, indicating that Chad and Bradley have resided together in the past. I believe it is also possible that Bradley was visiting with Chad and using Chad's internet service at the time Bradley's IP address accessed by the bennettc Live.me account listed to Chad Wagner's AT&T internet account at 7645 W. Dakota St. in West Allis.

23. I ran the name of Bradley Tollefson through NCIC and DOT and observed that he had been arrested in 2011 by the St. Francis Police Department for third degree sexual assault. I obtained a copy of this police report from the St. Francis Police Department and confirmed Bradley's arrest for sexual assault. That case number is 11-003112.

24. On January 8, 2018, I checked Facebook for a profile for Bradley Tollefson. I located a profile in this name at URL <https://www.facebook.com/brad.tollefson.9>, which had several photographs on it that matched the DOT picture for Bradley Tollefson from this case. He is Facebook friends with Chad and Lindsay Wagner, and his place of employment is listed as Turf Tech Elite in Milwaukee. There are many pictures of Bradley with an adult female and a female child who is about five years old. The adult female is referred to as "Megan Czajkowski." When I clicked on a link to view Megan Czajkowski's Facebook profile page, I reached the profile with a URL of <https://www.facebook.com/mczajkowski>, and the page was in the name of Megan Marie. I observed that Megan had changed her

profile picture on January 2, 2018 to an image of her with Bradley, indicating that they are still a couple and likely reside together.

25. I again reviewed the various IP addresses that were used by user bennettc to log onto Live.me. It appears that the user is utilizing WIFI to access the internet at times due to the use of various IP addresses. I ran several of the IP addresses listed on the log, specifically the IP addresses that were repeated on different dates, through Arin WhoIs.net to determine what Internet Service Provider (ISP) was operating that IP address. There were some consistently used IP addresses which listed to AT&T and others that listed to Time Warner Cable/Charter Communications. On January 5, 2018, I requested that OST Churches at the FBI complete and submit administrative subpoenas for several of these IP addresses.

26. On January 17, 2018, I received the results from the administrative subpoena issued to Charter Communications. The results showed that the IP address of 184.55.211.39 was utilized by Turf Tech Elite in Milwaukee, which is Bradley's place of employment as listed on his Facebook page. The results also showed that the IP address of 98.144.181.99 was assigned to James J. Czajkowski. Per Accurint results, it appears that James Czajkowski is the father of Bradley's girlfriend, Megan Czajkowski.

27. On January 8, 2018 I applied for a search warrant to Google (gmail) in order to obtain the subscriber information for the email address bradtoll41@gmail.com, in addition to the IP address logs for the IP addresses used to access this email address between

September 1, 2017 and January 8, 2018. The search warrant was reviewed and signed by Judge Wagner of the Milwaukee County Circuit Court in Brach 38.

28. On January 15, 2018, I received the search warrant results from Google. The subscriber information for the email address bradtoll41@gmail.com showed that the name is "Brad Tolefsn" and the recovery email address is bradtoll@hotmail.com. The SMS phone number associated with the account is 1-414-628-1215. I ran this phone number through Google. The name associated with it is Bradley Tollefson, and it is a mobile phone. I ran this number in Facebook, and the associated account is the same profile I had located for Brad Tollefson with the URL of <https://www.facebook.com/brad.tollefson.9>.

29. I also reviewed the IP address log from the search warrant results from Google. An IP address that was frequently used was 99.6.98.66, which is assigned to AT&T. This IP address was also used on a regular basis to log into the bennettc Live.me account and is assigned to Bradley's place of employment. The IP addresses 98.144.181.99 and 184.55.211.39 are also used often to log into the email account and are assigned to Charter Communications. These IP addresses were also used to access the Live.me account.

30. I conducted an Accurant search for both Bradley Tollefson and Megan Czajkowski to determine their address. They are both listed to be residing at 5961 S. Hatley Ave. in Cudahy, WI. A property search was conducted through the City of Cudahy's website and the listed property owner of this residence is Bradley L. Tollefson. A DOT check also revealed that Bradley has a vehicle registered in his name with this same address.

31. On January 29, 2018, I completed a surveillance request for investigators to conduct surveillance at the residence at 5961 S. Hatley Ave. in Cudahy. Surveillance was conducted on Friday, February 9, 2018 and Monday, February 12, 2018. Bradley Tollefson was observed leaving at the aforementioned address on February 12, 2018 at approximately 8:15 A.M.

CONCLUSION

Based on the foregoing, I submit that this affidavit establishes probable cause to believe that Bradley Tollefson has engaged in the production of child pornography, in violation of 18 U.S.C. § 2251(a).